

**UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF NEW YORK**

In re:

LORING ESTATES LLC, et al.,

Debtors.

**ROBERT L. GELTZER, as Chapter 7 Trustee
of LORING ESTATES LLC, et al.,**

Plaintiff,

-against-

LAEEQ A. BAJWA,

Defendant.

Chapter 7

Case No. 12-45757 (NHL)

Jointly Administered

Adv. Pro. No. 14 – 01104 (NHL)

**STIPULATION AND ORDER ADJOURNING PARTIES' TIME TO FILE
RULE 26(f) CERTIFICATION AND EXTENDING DISCOVERY DEADLINES**

WHEREAS, this adversary proceeding was commenced on August 6, 2014 by Robert L. Geltzer, Esq., as Chapter 7 trustee (the "Trustee") of the debtors, Loring Estates LLC, *et al.*, pursuant to 11 U.S.C. §§ 105, 502, 544 and 550 and New York Debtor Creditor Law §§ 273, 274, 275 and 278, (i) to avoid and recover the value of fraudulent conveyances made to Laeeq A. Bajwa (the "Defendant," together with the Trustee, hereinafter the "Parties"), plus applicable interest thereon; and (ii) to obtain related relief; and

WHEREAS, on October 23, 2014, a pre-trial hearing was held before this Court and the parties were directed to (i) exchange initial disclosures pursuant to Federal Rule of Civil Procedure ("FRCP") Rule 26 (a)(1) ("Initial Disclosures"); (ii) meet and confer pursuant to Rule 26(f) on or before December 1, 2014; and (iii) file a certification that the Rule 26(f) conference had taken place, as well as a written report outlining a proposed discovery plan, including all topics covered by Rule 26(f); and

WHEREAS, this Court entered a Pre-Trial Scheduling Order detailing the aforementioned deadline with respect to the Rule 26(f) certification on October 27, 2014 [ECF No. 6]; and

WHEREAS, the Parties were able to meet and confer pursuant to Rule 26(f) prior to the initial pre-trial conference on October 23, 2014; and

WHEREAS, the Parties exchanged Initial Disclosures on December 1, 2014; and

WHEREAS, the Parties required, and the Court granted, an additional 74 days to propose a discovery plan, including all topics covered by FRCP 26(f), as the Trustee was still waiting to obtain the Debtors' bank statements, canceled checks and other bank-related information to verify the true nature of, and the reasons for, the transfers at issue, including to verify to whom the transfers were made, substantiate designations found in the Debtors' books and records and verify any additional amounts not yet known to the Trustee; and

WHEREAS, the Trustee and his professionals are now in receipt of such bank documents from J.P. Morgan Chase, N.A.; and

WHEREAS, the Parties now require additional time to propose a discovery plan as counsel to the Defendant has advised that Defendant is *non compos mentis* and a guardianship hearing is scheduled for March 5, 2015 to appoint a legal representative to act on behalf of the Defendant; and

WHEREAS, in light of the foregoing circumstances, the Parties seek to extend the deadlines pertaining to the completion of discovery and the deadline by which the Joint Pretrial Memorandum must be filed as set forth in the Pre-Trial Scheduling Order; and

NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED TO by and between the respective undersigned counsel for the Parties as follows:

1. The time for the Parties to file a proposed discovery plan as required by Rule 26(f) and this Court's Order, dated October 27, 2014, in the above-captioned adversary proceeding is adjourned to May 27, 2015.

2. Completion of discovery as set forth in Paragraph 4 of the Pre-Trial Scheduling Order, dated October 27, 2014, shall be extended to June 15, 2015.

3. The time for the Parties to file the Joint Pretrial Memorandum, as set forth in Paragraph 5 of the Pre-Trial Scheduling Order, dated October 27, 2014, shall be extended to July 31, 2015.

TARTER KRINSKY & DROGIN LLP
*Substitute Special Litigation Counsel
to the Chapter 7 Trustee*

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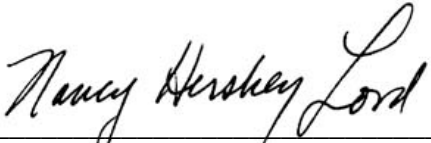
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Counsel to the Defendant

SO ORDERED:

Dated: March 1, 2015
Brooklyn, New York




Nancy Hershey Lord
United States Bankruptcy Judge